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16 Attorneys for Defendant  
GOOGLE LLC

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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 ANIBAL RODRIGUEZ, et al. individually and  
22 on behalf of all others similarly situated,

23 Plaintiffs,

24 v.

25 GOOGLE LLC,

26 Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF DEFENDANT  
GOOGLE LLC'S OPPOSITION TO  
PLAINTIFFS' MOTION FOR PERMANENT  
INJUNCTION AND DISGORGEMENT OF  
PROFITS**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Eduardo E. Santacana, hereby declare as follows:

2 1. I am a partner with the law firm Cooley LLP and am counsel for Defendant Google  
3 LLC (“Google”) in the above captioned action. I am duly licensed to practice law in the State of  
4 California and am admitted to practice before this Court. The matters set forth herein are of my  
5 own personal knowledge, and if called as a witness to testify, I could and would testify to these  
6 matters. I submit this declaration in support of Google’s Opposition to Plaintiffs’ Motion for  
7 Permanent Injunction and Disgorgement of Profits filed concurrently herewith.

8 2. Attached hereto as **Exhibit H** is a true and correct copy of an excerpt of the transcript  
9 of the December 15, 2022 deposition of Belinda Langner in this action. The excerpt includes the  
10 cover page of Exhibit 181 marked during Ms. Langner’s deposition, which indicates that the subject  
11 of her testimony was document GOOG-RDGZ-00184247, which was marked PX-419 at trial.

12 I declare under penalty of perjury under the laws of the State of California and the United  
13 States of America that the forgoing is true and correct.

14 Executed on November 19, 2025, at San Francisco, California.

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16  
17 /s/ Eduardo E. Santacana

18 Eduardo E. Santacana  
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